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4 JANE DOE,
5 Plaintiff,
6 v.
7 UBER TECHNOLOGIES, INC., et al.,
8 Defendants.
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10 Case No. [19-cv-03310-JSC](#)
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13 **ORDER RE: DISCOVERY DISPUTES**
14 Re: Dkt. Nos. 84, 85, 86
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16 Now pending before the Court are three discovery dispute joint letters. (Dkt. Nos. 84, 85,
17 86.)

18 **1. 30(b)(6) Deposition Date (Dkt. No. 84)**

19 The Court interprets Plaintiff's motion as request, in part, that she be allowed more than
20 seven hours of deposition time for Uber's 30(b)(6) witness. The request is granted. Given the
21 nature of the case and relevant discovery, much of the information Plaintiff requires must come
22 from a 30(b)(6) witness and it is unreasonable for Uber to hold Plaintiff to the seven-hour limit
23 that is the default for every federal case, regardless of circumstances. Given that ruling, the parties
24 must immediately meet and confer on the remaining three (of nine initial topics) on which the
25 parties disagree. The meet and confer must occur by Thursday, June 24, 2021 and be at least by
26 video. Any dispute as to those three topics must be raised with the Court by joint letter on or
before June 30, 2021. In the meantime, the parties should schedule the Rule 30(b)(6) deposition
on those nine topics for the month of July, which means Uber must prioritize and produce
documents relevant to those topics prior to the deposition.

27 **2. Uber's Interrogatory Responses (Dkt. No. 85)**

28 **Rogs 1-8.** Uber shall provide amended responses to interrogatories 1 through 8 on or

1 before June 28, 2021. A letter brief is not the place to respond to an interrogatory as Federal Rule
2 of Civil Procedure 33 requires that interrogatories be answered under oath.

3 **Rogs 9-16.** Uber shall answer these interrogatories under oath as required by Rule 33. If
4 that answer is that Uber does not know the answer or cannot find the answer then Uber shall so
5 state under oath. If Uber can identify someone with second-hand knowledge then Uber shall
6 identify that person; of course, if that person has second-hand knowledge, he or she may be able to
7 identify a person with personal knowledge.

8 **Rogs 17-25.** Uber shall answer the interrogatories regarding the protocols and scripts in
9 place at the time Mr. Sherman drove for Uber. Such protocols are relevant to Plaintiff's claim that
10 Uber was negligent.

11 **3. Uber's Responses to Document Requests (Dkt. No. 86)**

12 Uber's insistence that it need not provide a date for when it will produce responsive
13 documents is wrong. Federal Rule of Civil Procedure 34 states that a responding party must
14 produce responsive documents by the date specified by the Rule or in the document response
15 specify "another reasonable time." Fed. R. Civ. P. 34(2)(B). Uber has not specified any time, let
16 alone a reasonable time. Uber shall produce all responsive documents by June 30, 2021 and
17 supplemental written responses that specify whether any responsive documents are being withheld
18 as privileged by that same date. As the joint letter was filed on June 1, 2021, Uber has had more
19 than enough time to produce the responsive documents.

20 This Order disposes of Docket Nos. 84, 85, and 86.

21 **IT IS SO ORDERED.**

22 Dated: June 21, 2021

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JACQUELINE SCOTT CORLEY
26 United States Magistrate Judge
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